

REMARKS

Claims 1-30 are pending in the Application. Claims 1-30 were rejected under 35 U.S.C. §103(a). Applicants respectfully traverse the rejections and respectfully requests that the Examiner reconsider and withdraw all outstanding rejections.

I. REJECTIONS UNDER 35 U.S.C. §103(a):

The Office Action has rejected claims 1, 3-5, 9-11, 13-15, 19-21, 23-25 and 29-30 under 35 U.S.C. §103(a) as being unpatentable over Lennert et al. (U.S. Patent No. 6,055,227) (hereinafter "Lennert") in view of Simonyi (U.S. Patent No. 5,911,072). The Office Action has rejected claims 2, 12 and 22 under 35 U.S.C. §103(a) as being unpatentable over Lennert in view of Simonyi and further in view of Davies (U.S. Patent No. 6,002,396). The Office Action has rejected claims 6-7, 16-17 and 26-27 under 35 U.S.C. §103(a) as being unpatentable over Lennert in view of Simonyi and further in view of Pazel (U.S. Patent No. 6,028,999). The Office Action has rejected claims 8, 18 and 28 under 35 U.S.C. §103(a) as being unpatentable over Lennert in view of Simonyi and Pazel and further in view of Davies. Applicants respectfully traverse the rejections of claims 1-30 and respectfully request that the Examiner reconsider and withdraw all outstanding rejections.

A *prima facie* showing of obviousness requires the Examiner to establish, *inter alia*, that the prior art references teach or suggest, either alone or in combination, all of the limitations of the claimed invention, and the Examiner must provide a motivation or

suggestion to combine or modify the prior art reference to make the claimed inventions. See M.P.E.P. §2142. The motivation or suggestion to combine references must come from one of three possible sources: the nature of the problem to be solved, the teachings of the prior art, and the knowledge of persons of ordinary skill in the art. See *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1458 (Fed. Cir. 1998). The showings must be clear and particular. See *In re Dembicza*k, 50 U.S.P.Q.2d 1614, 1617 (Fed. Cir. 1999). Broad conclusory statements regarding the teaching of multiple references, standing alone, are not evidence. *Id.*

Furthermore, the Office Action states that "there is no requirement that a motivation to make the modification be expressly articulated. The test for combining references in what the combination of disclosures taken as a whole would suggest to one of ordinary skill in the art. *In re McLaughlin*, 170 U.S.P.Q. 209 (C.C.P.A. 1971). References are evaluated by what they suggest to one versed in the art, rather than by their specific disclosures. *In re Bozek*, 163 U.S.P.Q. 545 (C.C.P.A. 1969)." See Office Action, Page 6. *Applicants respectfully contest the assertion that the Examiner does not have to provide any evidence to support a suggestion or motivation for combining references. The Examiner must provide independent evidence to support the assertion that the suggestion to combine references comes from the knowledge and common sense of a person of ordinary skill in the art.* See *Smiths Industries Medical Systems Inc. v. Vital Signs Inc.*, 51 USPQ2d 1415, 1421 (Fed. Cir. 1999).

In order to reject under 35 U.S.C. §103, therefore, the Examiner must provide a proper motivation for combining or modifying the references. See M.P.E.P. §2142; *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1457-1458 (Fed. Cir. 1998). The Examiner recites that

"it would have been obvious to one of ordinary skill in the art at the time the invention was made to apply Simonyi's teaching of displaying one of a first routine called by said routine and a second routine calling said routine in response to said collection in Lennert's system with the motivation being *to provide the user with the detail description of the routine*. One skill in the art would appreciate the detail presentation of the routine since it enables one skill in the art to easily view, analyze, and comprehend the functionality of the routine for the purpose of using and debugging it. This motivation is considered well known within the knowledge of one skilled in the art." See Office Action, Pages 6-7.

There is no motivation to combine Simonyi with Lennert as there is no suggestion or motivation in either Simonyi or Lennert or their combination to combine the teaching of a *computer program that can create new network configuration databases* as taught in Lennert with the teaching of a computer method and system that *supports extensible computational constructs for use in creating a computer program* as taught in Simonyi. Lennert teaches that "the computer program of this invention establishes a new database structure and mines source databases to load source network configuration data into the new operator services database structure. The computer program is capable of searching for the desired data and automates many of the tasks for configuring a new operator services database from the source databases. *This eliminates the current requirement for manual data entry for configuring new operator services databases for telecommunication switches.*" See Column 2, Lines 11-20. Simonyi teaches that "the system represents a *computer program as an intentional program tree*, which is a high-level program tree that is a syntax-independent representation using high-level computational constructs." See Abstract. Simonyi further teaches that "because the

program is stored as an intentional program tree in a syntax-independent manner, the *editor allows the program to select in which of a various programming language the computer program is to be displayed*. In addition, the *system transforms an intentional program tree to a reduced program, which is a program tree comprising low-level computational constructs*, in a process called reduction. The reduction process replaces expressions of programmer's intents with a representation of one of possible multiple implementations of those intents using low-level computational constructs. See Abstract. As stated above, the Examiner stated that the motivation to combine Lennert with Simonyi was to *provide the user with the detail description of the routine*. Applicants respectfully contest the Examiner's implied assertion that Simonyi teaches providing a detailed description of a routine. Applicants respectfully request the Examiner to particularly point out the relevancy of providing a detailed description of a routine with the purpose of *eliminating the current requirement for manual data entry for configuring new operator services databases for telecommunication switches* as stated in Lennert. As interpreted by the Applicants, Lennert *teaches automating the tasks for configuring new operator services databases for telecommunication switches*. As interpreted by the Applicants, Simonyi teaches a system that allows a *program to select the programming language in which the program will be displayed*. Furthermore, as interpreted by the Applicants, Simonyi teaches that the system may *transform a high-level program tree to a low-level program tree comprising low-level computational constructs*. Therefore, there is no motivation to combine Simonyi with Lennert as there is no suggestion or motivation in either Simonyi or Lennert or their combination to combine the teaching of a *computer program that can create new network configuration databases* as taught in Lennert with the teaching of a computer method and system that *supports extensible computational constructs for use in creating a computer program* as taught in Simonyi.

Furthermore, the Examiner recites that "it would have been obvious to one of ordinary skill in the art at the time the invention was made to apply Davis's teaching of first window region comprises a calls window region and a second window region comprises a called-by window region in Lennert's system with the *motivation to provide a convenient graphical representation of the called-by routine*. One skill in the art would appreciate the graphical representation of the called-by routine since it enables one skill in the art to easily view, analyze, and comprehend the hierarchy of the routine for the purpose of using and debugging it. This motivation is considered well known within the knowledge of one skill in the art." See Office Action, Page 7. Furthermore, the Examiner recites that "it would have been obvious to one of ordinary skill in the art at the time the invention was made to apply Davis's teaching of the step of displaying said one of said first and second routines further comprises the step of displaying said second routine in response to a routine called field of said entry in Lennert's system with the motivation *being to accurately and efficiently display the routine*. See Office Action (dated January 4, 2001), Page 7. The Examiner further recites that "one skill in the art would appreciate the accurate and efficient display of the routine since it enables one skill in the art to easily view and analyze for the purpose of using and debugging it. This motivation is considered well known within the knowledge of one skill in the art." See Office Action, Page 7.

There is no motivation to combine Davis with Lennert as there is no suggestion or motivation in either Davis or Lennert or their combination to combine the teaching of a *computer program that can create new network configuration databases* as taught in Lennert with the teaching of *creating a process structure for performing a task* as taught in Davis. Lennert teaches that "the computer program of this invention establishes a new

database structure and mines source databases to load source network configuration data into the new operator services database structure. The computer program is capable of searching for the desired data and automates many of the tasks for configuring a new operator services database from the source databases. *This eliminates the current requirement for manual data entry for configuring new operator services databases for telecommunication switches.*" See Column 2, Lines 11-20. Davis teaches that "a task could usefully use a tool that would assist him or her in taking a logical course through the identification and definition of the steps themselves necessary in performing a particular task." See Column 1, Lines 44-47. Davis further teaches "a system and method for defining a process structure for performing a task." See Abstract. As stated above, the Examiner stated that the motivation to combine Lennert with Davis was to *provide a convenient graphical representation of the called-by routine.* Applicants respectfully contest the Examiner's implied assertion that Davis teaches providing a graphical representation of the called-by routine. Furthermore, Applicants respectfully request the Examiner to particularly point out the relevancy of providing a convenient graphical representation of the called-by routine with the purpose of *eliminating the current requirement for manual data entry for configuring new operator services databases for telecommunication switches* as stated in Lennert. As stated above, the Examiner stated that the motivation to combine Lennert with Davis was to *accurately and efficiently display the routine.* Applicants respectfully contest the Examiner's implied assertion that Davis teaches displaying a routine. Furthermore, Applicants respectfully request the Examiner to particularly point out the relevancy of accurately and efficiently displaying a routine with the purpose of *eliminating the current requirement for manual data entry for configuring new operator services databases for telecommunication switches* as stated in Lennert. As interpreted by the Applicants,

Lennert *teaches automating the tasks for configuring new operator services databases for telecommunication switches*. As interpreted by the Applicants, Davis teaches a system that *allows a user to identify the steps necessary in performing a particular task as well as tracking the progress of the particular task and its constituent steps*. Therefore, there is no motivation to combine Davis with Lennert as there is no suggestion or motivation in either Davis or Lennert or their combination to combine the teaching of a *computer program that can create new network configuration databases* as taught in Lennert with the teaching of *creating a process structure for performing a task* as taught in Davis.

Furthermore, the Examiner recites that "it would have been obvious to one of ordinary skill in the art at the time the invention was made to apply Pazel's teaching of accessing a data structure stored in a database in Lennert's system with the *motivation being to conveniently identify routines*." See Office Action (dated January 4, 2001), Page 6. The Examiner further recites that "one skill in the art would appreciate the convenient identification of a routine since it enables one skill in the art to easily recognize, view and analyze the routine for the purpose of using and debugging it. This motivation is considered well known within the knowledge of one skill in the art." See Office Action, Page 7. Furthermore, the Examiner recites that "it would have been obvious to one of ordinary skill in the art at the time the invention was made to apply Pazel's teaching of displaying said one of said first and second routines further comprises the step of displaying said first routine in response to said routine identifier in a routine field of said entry in Lennert's system with the *motivation being to conveniently identify routines*" See Office Action (dated January 4, 2001), Page 7.

There is no motivation to combine Pazel with Lennert as there is no suggestion or motivation in either Pazel or Lennert or their combination to combine the teaching of a *computer program that can create new network configuration databases* as taught in Lennert with the teaching of a *program error detection tool* as taught in Pazel. Lennert teaches that "the computer program of this invention establishes a new database structure and mines source databases to load source network configuration data into the new operator services database structure. The computer program is capable of searching for the desired data and automates many of the tasks for configuring a new operator services database from the source databases. *This eliminates the current requirement for manual data entry for configuring new operator services databases for telecommunication switches.*" See Column 2, Lines 11-20. Pazel teaches "a system and method for *constructing a program error detection tool* herein referred to as a 'virtual debugger.' The virtual debugger aids in alleviating many of the foregoing problems by *allowing testing of complex program units to be conducted prior to component or integration testing*, and *even prior to the component development completion*. This is achieved through 'non-sequential program statement execution' in an incompletely assembled program runtime environment." See Column 2, Lines 13-21. As stated above, the Examiner stated that the motivation to combine Lennert with Pazel was to *conveniently identify routines*. Applicants respectfully contest the Examiner's implied assertion that Pazel teaches a system or method that conveniently identifies routines. Furthermore, Applicants respectfully request the Examiner to particularly point out the relevancy of conveniently identifying routines with the purpose of *eliminating the current requirement for manual data entry for configuring new operator services databases for telecommunication switches* as stated in Lennert. As interpreted by the Applicants, Lennert *teaches automating the tasks for configuring new operator services databases*

for telecommunication switches. As interpreted by the Applicants, Pazel teaches an error detection tool. Therefore, there is no motivation to combine Pazel with Lennert as there is no suggestion or motivation in either Pazel or Lennert or their combination to combine the teaching of a *computer program that can create new network configuration databases* as taught in Lennert with the teaching of a *program error detection tool* as taught in Pazel.

Lennert and Simonyi, taken singly or in combination, do not teach or suggest "*selecting a routine from a routine list displayed in one of a first and a second window region*" as recited in claim 1 and similarly in claims 11 and 21. Instead, Lennert teaches a "browse feature 124" that "*allows the user to select the environment 132, then calls the display equipment (dis_eq) routine 134, the display packs (disp_paks) routine 136, the display features (disp_feat) routine 138, the display equipment number (disp_ens) routine 140, and the display the test user guide (disp_tug) routine 142.*" See Column 7, Lines 34-40. As interpreted by the Applicants, Lennert allows the user to *select the environment which calls various routines.* The Office Action states that "[i]n Fig. 6, Lennert teaches window region comprising the environment 132 which, when selected, calls a list of routine. Then components associating with each routine are displayed. Therefore, it is inherent that the user can select a routine from the routine list as claimed in claims 1, 11 and 21." See Office Action, Pages 7-8. Applicants respectfully contest the assertion that it is inherent that a user can select a routine from the routine list. *Applicants respectfully request the Examiner to particularly point out in Lennert or Simonyi or their combination where a user can select a routine from the routine list.* The Examiner has provided *no objective evidence* in making an assertion that it is inherent that a user can select a routine from the routine list. The Examiner must provide a basis

in fact and/or technical reasoning to support the determination that the allegedly inherent characteristic necessarily flows from the teachings of the applied prior art. See *Ex parte Levy*, 17 USPQ2d 1461, 1464 (Bd. Pat. App. & Inter. 1990); M.P.E.P. §2112. Therefore, Lennert and Simonyi, taken singly or in combination, do not teach or suggest *selecting a routine from a routine list*. Neither does Lennert and Simonyi, taken singly or in combination, teach or suggest "selecting a routine a routine list *displayed in one of a first and a second window region*."

Lennert and Simonyi, taken singly or in combination, do not teach or suggest "*displaying one of a first routine called by said routine and a second routine calling said routine in response to said selection*" as recited in claim 1 and similarly in claims 11 and 21. Simonyi teaches that "the routine creates a data structure called a display list. After the routine completely expands the display list, the routine uses it to display the representation. The display list is a linked list that contains *display list items*, each of which can either be *unexpanded or expanded*." See Column 23, Lines 11-15. Simonyi further teaches that "*expanded display list items, on the other hand, correspond to one of one or more pieces of the display representation details associated of the type of a particular node of the subtree*." See Column 23, Lines 19-22. Simonyi further teaches that "*the routine replaces the unexpanded display list with a replacement set of display list items specified by the selected representation format. Some of the display list items may be expanded and correspond to the actual display representation, while others may be unexpanded and correspond to nodes of the subtree that are children of the node to which the replaced display list entry corresponds*." See Column 23, Lines 30-38. As interpreted by the Applicants, Simonyi simply teaches items that may be expanded or unexpanded. However, Lennert and Simonyi, taken singly or in combination, do not

teach or suggest *displaying one of a first routine called by said routine*. Applicants respectfully request the Examiner to particularly point out in Lennert or Simonyi the teaching of displaying a routine called by a particular routine. Furthermore, Lennert and Simonyi, taken singly or in combination, do not teach or suggest *displaying a second routine calling said routine in response to said selection*. Applicants respectfully request the Examiner to particularly point out in Lennert or Simonyi the teaching of displaying a routine that called the particular routine.

For at least the above reasons, claims 1, 11 and 21 are patentable over Lennert in view of Simonyi in further view of Davies and Pazel. Claims 2-10, 12-20 and 22-30 each recite combinations of features including the above combinations, and thus are patentable for at least the above reasons as well. Claims 2-10, 12-20 and 22-30 recite additional features which, in combination with the features of the claims upon which they depend, are patentable over Lennert in view of Simonyi in further view of Davies and Pazel.

For example, Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest "wherein said *first window region comprises a calls window region* and said *second window region comprises a called-by window region*" as recited in claim 2 and similarly in claims 12 and 22. The Office Action directs Applicants attention to Figure 5 in Davis as teaching a first window comprising a calls window region and a second window region comprising a called-by window region. See Office Action, Page 8. The Office Action states that "the three routines 'Establish Product Concept', 'Develop Financial Plan' and 'Set-up Business' form 'a calls window region' wherein 'Set-up Business' calls 'Build a Business Plan' and 'Build a Business Plan' calls

'Establish Product Concept.' The three routines 'Develop Financial Plan', 'Build a Business Plan', and 'Set-up Business' form 'a called-by window region' wherein 'Set-up Business' is called by 'Build a Business Plan' and 'Build a Business Plan' is called by 'Establish Product Concept'." See Office Action, Page 8. Applicants respectfully contest the Office Action's assertion that Figure 5 in Davis teaches a first window comprising a calls window region and a second window region comprising a called-by window region. Instead, Davis teaches that "the method is developing from right to left across the screen in response to the HOW mode." See Column 8, Lines 36-37. Davis further teaches that "in the HOW? mode the associated steps in adjacent stages in the developing task model are linked by arrows pointing from right to left." See Column 8, Lines 39-41. Davis further teaches that "the user in this example can then work backwards, asking the question WHY? to define for the model the relevance of this process. This is illustrated in FIG. 5 in which the basic task processes of 'build a business plan' and 'secure finances' appear." See Column 9, Lines 3-7. As interpreted by the Applicants, *Figure 5 in Davis teaches a display screen displaying steps of how to accomplish a particular task and why those steps are necessary.* As interpreted by the Applicants, *Davis does not teach routines calling other routines or routines being called by other routines. Davis simply teaches displaying steps of how to perform a task and why those steps are necessary.* Therefore, Figure 5 in Davis does not teach a window region comprising a *calls window region* or a *called-by window region*. Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest a *first window region that comprises a calls window region*. Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest a *second window region that comprises a called-by window region*.

Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest "said routine list is contained in a *plurality of data structures stored in a database*" as recited in claim 3 and similarly in claims 13 and 23. The Office Action states that "it is inherent that Simonyi's system should have a database to store data structures which comprise the routine list so that each routine in the routine list, when called, can display its associating components." See Office Action, Page 8. The Examiner has provided *no objective evidence* in making an assertion that it is inherent that Simonyi's system should have a database to store data structures which comprise the routine list so that each routine in the routine list, when called, can display its associating components. The Examiner must provide a basis in fact and/or technical reasoning to support the determination that the allegedly inherent characteristic necessarily flows from the teachings of the applied prior art. See *Ex parte Levy*, 17 USPQ2d 1461, 1464 (Bd. Pat. App. & Inter. 1990); M.P.E.P. §2112. Furthermore, Simonyi teaches that "*the routine creates a data structure called a display list. After the routine completely expands the display list, the routine uses it to display the representation. The display list is a linked list that contains display list items*, each of which can either be unexpanded or expanded." See Column 23, Lines 11-15. As interpreted by the Applicants, Simonyi teaches creating a data structure that may be used to display a display representation for the nodes in an IP tree. As interpreted by the Applicants, Simonyi teaches a data structure that is a display list. Accordingly, the *display list is not a routine list contained in a plurality of data structures*. Furthermore, Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest that the plurality of data structures are *stored in a database*.

Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest "said step of selecting said routine from a routine list comprises the step of *selecting an icon associated with said routine*, wherein said *icon flags said routine as having an undisplayed routine dependency*" as recited in claim 5 and similarly in claims 15 and 25. The Office Action states that "Applicants' attention is directed to Fig. 11C wherein reference number 1163 represents an icon flagging an undisplayed routine dependency." See Office Action, Page 9. Applicants respectfully *contest the assertion that reference number 1163 represents an icon associated with a routine*. Furthermore, Applicants respectfully *contest the assertion that reference number 1163 represents an icon that flags a routine as having an undisplayed routine dependency*. Instead, Simonyi teaches that "because the user is likely to next insert a node to replace the placeholder node, the IP tree editor has *moved the insertion point 1153 to the placeholder node as a tree selection*. This tree selection insertion point 1153 is indicated by the horizontal bar on the line above node 1152. *In the display representation*, the IP tree editor has generated an asterisk as the display representation for the new multiplication node and question marks for the new placeholder node, and moved the *tree selection insertion point 1163 to the question marks*." See Column 24, Lines 20-30. As interpreted by the Applicants, the insertion point in Simonyi is not associated with a routine but instead represents a point that a programmer may insert a particular node. Furthermore, as interpreted by the Applicants, the insertion point does not represent an undisplayed routine dependency but a point that a programmer may insert a particular node. Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest *selecting an icon associated with said routine*. Furthermore, Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest an *icon that flags a routine as having an undisplayed routine dependency*.

Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest "said step of accessing a data structure stored in a database, said data structure having an entry corresponding to said routine, and wherein said step of *displaying* said one of said first and second routines comprises the step of displaying said one of said first and second routines in *response to a routine identifier*, corresponding to said one of said first and second routines, contained in a portion of said entry" as recited in claim 6 and similarly in claims 16 and 26. Instead, Pazel teaches a "global data dictionary 13" that "provides information about the structure and location of program routines and application-wide program definitions." See Column 4, Lines 58-60. Pazel further teaches a "global routine list 16" that "provides a *list of global routine items 17*, each containing details about each routine in the application. *Each global routine item* preferably *contains* the routine's name 18, a *unique reference identifier 19*, and the routine's location 20 within the program content." See Column 6, Lines 6-11. As interpreted by the Applicants, Pazel teaches a list comprising routine items where each routine item may comprise a *reference identifier*. As interpreted by the Applicants, Pazel *does not teach displaying* said one of said first and second routines *in response to a routine identifier* but simply teaches storing a reference identifier associated with a particular routine item. The Office Action states that "Lennert teaches the displaying routine when selected." See Office Action, Page 9. Applicants respectfully contest the assertion that Lennert teaches displaying a routine *when selected* for the reasons stated above. Furthermore, Applicants respectfully contest the implied assertion that Lennert teaches displaying a routine *in response to a routine identifier*. As stated above, a *prima facie* showing of obviousness requires the Examiner to establish, *inter alia*, that the prior art references teach or suggest, either alone or in combination, all of the limitations of the

claimed invention, and the Examiner *must provide a motivation or suggestion to combine or modify the prior art reference to make the claimed inventions*. See M.P.E.P. §2142. The *Examiner has not provided any motivation or suggestion to modify Lennert or Simonyi or Davies or Pazel or their combination to display a routine in response to a routine identifier*. Therefore, the Examiner has not presented a *prima facie* case of obviousness. Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest *displaying* said one of said first and second routines comprises the step of displaying said one of said first and second routines in *response to a routine identifier*.

Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest "*displaying said first routine in response to said routine identifier in a routine field of said entry*" as recited in claim 7 and similarly in claims 17 and 27. Instead, Pazel teaches a "global data dictionary 13" that "provides information about the structure and location of program routines and application-wide program definitions." See Column 4, Lines 58-60. Pazel further teaches a "*global routine list 16*" that "provides a *list of global routine items 17*, each containing details about each routine in the application. *Each global routine item preferably contains* the routine's name 18, a *unique reference identifier 19*, and the routine's location 20 within the program content." See Column 6, Lines 6-11. As interpreted by the Applicants, Pazel teaches a list comprising routine items where each routine item may comprise a *reference identifier*. As interpreted by the Applicants, Pazel does not teach *displaying a routine in response to a routine identifier in a routine field of the entry*. The Office Action states that "Lennert teaches the displaying routine when selected." See Office Action, Page 10. Applicants respectfully contest the assertion that Lennert teaches displaying a routine *when selected* for the reasons stated above. Furthermore, Applicants respectfully contest the implied assertion

that Lennert teaches displaying a routine *in response to a routine identifier*. As stated above, a *prima facie* showing of obviousness requires the Examiner to establish, *inter alia*, that the prior art references teach or suggest, either alone or in combination, all of the limitations of the claimed invention, and the Examiner *must provide a motivation or suggestion to combine or modify the prior art reference to make the claimed inventions*. See M.P.E.P. §2142. The *Examiner has not provided any motivation or suggestion to modify Lennert or Pazel or Simonyi or Davies or their combination to display a routine in response to a routine identifier*. Therefore, the Examiner has not presented a *prima facie* case of obviousness. Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest *displaying a routine in response to a routine identifier in a routine field of the entry*.

Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest "*displaying said second routine in response to said routine identifier in a routine called field of said entry*" as recited in claim 8 and similarly in claims 18 and 28. The Office Action states that "Pazel teaches that each routine comprises a reference identifier (Fig. 3), Lennert teaches the displaying routine when selected (Fig. 6). Davies teaches the displaying of routine which calls other routine (second routine) (Fig.5)." See Office Action, Page 10. Applicants respectfully contest the assertion that Lennert teaches displaying a routine *when selected* for the reasons stated above. Furthermore, Applicants respectfully contest the assertion that Davies teaches the displaying of routine which calls other routine for the reasons stated above. Furthermore, the Office Action (dated January 4, 2001) directs Applicants attention to the last three routines in Figure 5 in Davis as teaching displaying the second routine in response to the routine identifier in a routine called field of the entry. See Office Action (dated January 4, 2000), Page 7. Applicants

respectfully contest the Office Action's assertion that Figure 5 in Davis teaches displaying the second routine in response to the routine identifier in a routine called field of the entry. As interpreted by the Applicants, *the last three entries in Figure 5 in Davis are steps to accomplish a particular task*. As interpreted by the Applicants, Figure 5 in Davis does not teach *displaying a routine in response to a routine identifier* in a *routine called field of the entry*. Furthermore, as stated above, a *prima facie* showing of obviousness requires the Examiner to establish, *inter alia*, that the prior art references teach or suggest, either alone or in combination, all of the limitations of the claimed invention, and the Examiner *must provide a motivation or suggestion to combine or modify the prior art reference to make the claimed inventions*. See M.P.E.P. §2142. The *Examiner has not provided any motivation or suggestion to modify Lennert or Pazel or Simonyi or Davies or their combination to display a routine in response to a routine identifier in a routine called field of the entry*. Therefore, the Examiner has not presented a *prima facie* case of obviousness. Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest *displaying a routine in response to a routine identifier in a routine called field of the entry*.

Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest "the step of *specifying a routine type*, and wherein said step of displaying said one of said first and second routines comprises the step of *displaying* said one of said first and second routines *in response to said routine type*" as recited in claim 9 and similarly in claims 19 and 29. Instead, Lennert teaches a "browse feature 124" that "allows the user to select the environment 132, then calls the display equipment (*dis_eq*) routine 134, the display packs (*disp_paks*) routine 136, the display features (*disp_feat*) routine 138, the display equipment number (*disp_ens*) routine 140, and the display the

test user guide (disp_tug) routine 142." See Column 7, Lines 34-40. As interpreted by the Applicants, Lennert allows the user to *select the environment which calls various routines*. The Office Action states that "although Lennert does not explicitly use the phrase 'routine type', each routine in Fig. 6 can be interpreted as each routine type." See Office Action, Page 10. Applicants respectfully contest the Examiner's interpretation that each routine can be interpreted as a routine type. Furthermore, the Examiner must consider each word in a claim in judging the patentability of that claim against the prior art. See *In re Wilson*, 424 F.2d 1382, 1385, 165 U.S.P.Q. 494, 496 (C.C.P.A. 1970); M.P.E.P. §2143.03. As interpreted by the Applicants, the Examiner has not considered routine and routine type separately. Furthermore, assuming arguendo that each routine can be interpreted as a routine type, Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest "the step of *specifying a routine type*." Furthermore, Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest *displaying* said one of said first and second routines *in response to said routine type*.

Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest "the step of *displaying said routine list in said first and second window regions*" as recited in claim 10 and similarly in claims 20 and 30. The Office Action states that "in Fig. 6, Lennert teaches the displaying different routines when selected. Each routine will be displayed in an area which can be interpreted as a window region." See Office Action, Page 11. Applicants respectfully contest the assert that Lennert teaches displaying different routines *when selected* for the above reasons. Furthermore, Lennert teaches that "the display equipment (dis.sub.-- eq) routine 134 displays all switch module and unit configuration within the switch module. The dumpdf routine 135 is

used on all eq* forms (equipment related data) 137 in the selected circuit packs. The display packs (disp.sub.-- pak) routine 136 displays all circuit packs 144 and their locations. The display packs (disp.sub.-- paks) routine 136 uses dumpdf 135 after extracting the appropriate data to view from the office data administration makefdt command 146. The display feature (disp.sub.-- feat) routine 138 displays the feature information based on specific hardcoded selections by accessing the mapped relations 148." See Column 7, Lines 40-51. As interpreted by the Applicants, Lennert simply teaches displaying information associated with a *particular routine* in a particular area designated for that routine. Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest "the step of displaying *said routine list in said first and second window regions.*"

As a result of the foregoing, Applicants respectfully assert that the Examiner's prima facie case of obviousness is not taught or suggested by the cited prior art since there are numerous claim limitations, and thus one skilled in the art would not have been able to create the claimed invention in view of the cited prior art.

II. CONCLUSION

As a result of the foregoing, it is asserted by Applicants that the remaining Claims in the Application are in condition for allowance, and respectfully request an early allowance of such Claims.

Applicants respectfully request that the Examiner call Applicants' attorney at the below listed number if the Examiner believes that such a discussion would be helpful in resolving any remaining problems.

Respectfully submitted,

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